

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

2018 MAR -1 AM 2:34

Akeel Abdul Jamiel

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

AMENDED  
COMPLAINT

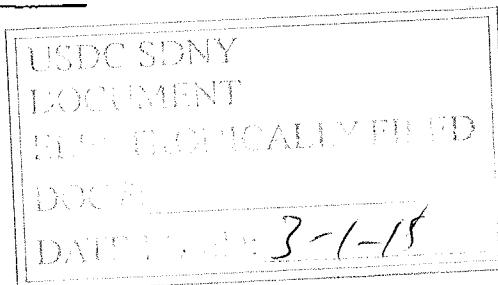
under the Civil Rights Act,  
42 U.S.C. § 1983

CPL Catangelo  
Deputy Gurrieri  
Deputy M. Washburn  
Deputy M. Shaw  
Deputy Shaw other brother.  
Deputy Mantiferi

Jury Trial:  Yes  No  
(check one)

Civ. ( )

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)



I. Parties in this complaint:

A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff's

Name Akeel Abdul Jamiel  
ID# 18A0202  
Current Institution Willard Drug treatment Campus  
Address 7116 County Road 132, P.O. Box 303  
Willard, New York, 14588

B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name CPL Catangelo Shield # unknown  
Where Currently Employed 4 Bushnell Ave  
Address Monticello, NY, 12701

Defendant No. 2

Name Deputy Carrier Shield # unknown  
Where Currently Employed 4 Bushnell Ave  
Address Monticello NY, 12701

Defendant No. 3

Name Deputy M. Washburn Shield # unknown  
Where Currently Employed 4 Bushnell Ave  
Address Monticello, NY, 12701

Who did what?

Defendant No. 4

Name Deputy M. SHAW Shield # unknown  
Where Currently Employed 4 Bushnell Ave  
Address Monticello, NY, 12701

Defendant No. 5

Name Deputy SHAW Shield # unknown  
Where Currently Employed 4 Bushnell Ave  
Address Monticello, NY, 12701

## II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?

Sullivan County Jail 4 Bushnell Ave  
Monticello, NY, 12701

B. Where in the institution did the events giving rise to your claim(s) occur?

Medical, and C-block, And Everywhere in SCJ.

C. What date and approximate time did the events giving rise to your claim(s) occur?

November 27th, 2017 at 2:21 PM.

D. Facts: ON or about 2:21 PM on November 27th, 2017,

I notified a deputy by the name of Noble on C-block,  
that I have a problem on this block and my safety is  
at stake. Deputy Noble did not notify a supervisor by

What happened to you?

the title of Cpl Calangelo (Woman) and Sent me down to medical to speak with me, in regards to my problem that I have in C-block pertaining to my right risk. Cpl Calangelo, yelled at me for not telling her the name of the inmates and stated that she's going to write me up for not giving up names, which she did. I assured Ms. Calangelo that if I were to give up names I will not be able to live on any other block as a rat, and its best for my safety that she can just move me to any other block and that would solve the issue. but, she refused and sent me back to C-block where my safety is at stake. She wrote me up and so one other Deputies. As a result I spent most of my time in the box as a retaliation because I filed a lawsuit, I now suffer a mental condition and on Psych Medication in Downstate C.F. Also I'm complaining from other Deputies who are slandering my character and telling my fellow inmates that I am a homo-sexual. See Attached Paper.

Was anyone else involved?

Who else saw what happened?

### III. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

My second finger in my left hand had tendons injuries and as a result my knuckle is not visible. I also suffered mentally, where I had to beg them to see the psych and I were placed on psych meds in Sullivan County and in Downstate. The Psych at Downstate has my files.

### IV. Exhaustion of Administrative Remedies:

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes  No

The following Deputies are the individuals that are slandering my character and referring to me as a homo-sexual, and they are as follows: Deputy Currieri, Deputy Washburn, Deputy M. Shaw. Deputy Shaw who also related to M. Shaw, Deputy Mountifieri.

All mentioned Deputies are the individuals who refers to me as a homo, and call me by names such as Peanut butter & Jelly, turkey and other nasty names that supposedly describes a gay person, which was referring to me. I got into a conflict in A-block and led to a fight with another inmate by the name of Chris Caywood, he called me a homo-sexual, or should I say turkey, all because the above deputies slandering my character and going around the jail telling inmates that I am supposed to be a homo-in the closet. Multiple inmates that approached me and informed and who made fun of me, making statement such as "turkey" and "Peanut butter" and "Jelly". At one occasion when first arrived at SCJ. Deputy M. Shaw yelled out (you're a homo) referring that to me. They completely damaged my character and my mental completely by making such accusations and harassments. I recently grieved that issue but they never send me the grievance as it supposed to had followed me. it was dated 1/5/18.

I suffered mentally and physically from the above Deputies, not to mention Deputy Currieri and Deputy M. Washburn who were the 2 Deputies who set up the fights that I had with my fight risk.. an inmate by the name of spencer an elderly gentleman, who informed of that fact! I asked how he knew, and he replied that all the inmates talking about it. and how the C.O's rewinding the camera and laughing at me. I'm currently disabled and my hip is fused to my back. And the above Deputies Continously retaliating against me and slandering me.

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Sullivan County Jail @ 4 Bushnell Ave  
Monticello, NY, 12701

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes  No  Do Not Know

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes  No  Do Not Know

If YES, which claim(s)? Grieved it but did not get a response

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes  No

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes  No

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

Sullivan County Jail

1. Which claim(s) in this complaint did you grieve?

The Sexual Harrasment refered to the homo-Sexual Rumors -

2. What was the result, if any?

I sent the Grievance, they spilled coffee on it, did not get back

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process.

Did not get a chance, they held it for a week then, sent to me damaged with coffee I didn't and they haven't returned it till this day 2/5/18.

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

~~Reasons for not filing a grievance~~

2. If you did not file a grievance but informed any officials of your claim, state who you informed, when and how, and their response, if any:

~~Handwritten note: They were afraid that the grievance was going to hurt the facility, so they damaged it and supposedly they're supposed to send it to me as it should follow me to this prison. But I believe they threw it out because it was detrimental to the staff and facility.~~

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Handwritten note: Basically they were afraid that the grievance was going to hurt the facility, so they damaged it and supposedly they're supposed to send it to me as it should follow me to this prison. But I believe they threw it out because it was detrimental to the staff and facility.

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). Handwritten note: I'm seeking the amount of 50,000,000.00 fifty million dollars for my pain and mental suffering as a result from their oppression and mental abuse.

**VI. Previous lawsuits:**

On these claims

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes  No \_\_\_\_\_

B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff Akeel Abdul Jamiel

Defendants Deputy Fries, Deputy Washburn, Chief Smith, Deputy Pulte, Daniel Patrick Moynihan, Southern District of New York, 500 Pearl St.

3. Docket or Index number 17-CV-7172

4. Name of Judge assigned to your case Nelson, S. Roman

5. Approximate date of filing lawsuit October 6, 2017

6. Is the case still pending? Yes  No  Oct. 6, 2017.

If NO, give the approximate date of disposition \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) Still pending.

No judgement had been made yet.

On other claims

C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?

Yes  No \_\_\_\_\_

D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff Akeel Abdul Jamiel

Defendants Rober Mir, Detective Scott Galligan,

2. Court (if federal court, name the district; if state court, name the county) The Daniel Patrick Moynihan, Southern District of New York, 500 Pearl St.

3. Docket or Index number 17-CV-7579

4. Name of Judge assigned to your case Kenneth M. Karas

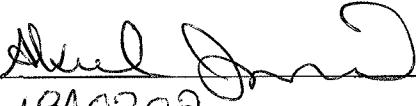
5. Approximate date of filing lawsuit Oct. 6, 2017.

6. Is the case still pending? Yes  No   
If NO, give the approximate date of disposition \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) Still Pending No  
Judgement has been made

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 23 day of Feb, 2018.

Signature of Plaintiff 

Inmate Number 18A0202

Institution Address Willard Drug treatment Campus

7116 County Road 132, P.O. Box 303  
Willard, New York, 14588

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 23 day of February, 2018 I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

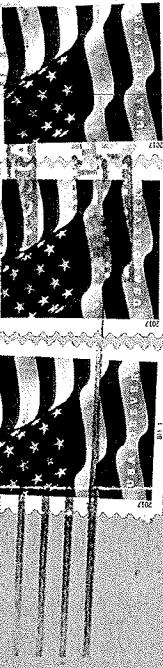
Signature of Plaintiff 

Sworn to before  
me this 23<sup>rd</sup> day  
of February 2018  


M. Appleby  
Notary Public - Monroe County  
#01AP6214593  
Expires on 12/14/2021

J.UU

14588  
11270844



P.O. BOX 303  
WILLARD, NEW YORK 14588

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clerk of court  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States  
Courthouse - 500 Pearl Street  
U.S. Courthouse  
PRO Se office  
RM 200  
New York, NY 10007

USNPP1  
USNPP2

Mail